



November 7th, 2017

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Notice of Ex Parte in CG Docket Nos. 03-123 and 10-51

Dear Ms. Dortch:

On Nov. 2nd, 2017, Peter Hayes, CEO of VTCSecure, LLC, and Michael Trentadue met with:

Patrick Webre, Chief, Consumer and Governmental Affairs Bureau (CGB)  
Karen Peltz Strauss, Deputy Chief, CGB  
Eliot Greenwald, Deputy Chief, Disability Rights Office (DRO), CGB  
Michel Scott, Attorney-Advisor, DRO, CGB  
David Schmidt, Office of the Managing Director

Peter Hayes started the meeting with updating the FCC on VTCSecure's recent activities including:

- Setting up TRS services in other parts of the world.
- Its TTY to RTT cloud conversion product.
- Updates concerning VTCSecure's patents for the use of remote Automated Speech Recognition (ASR) for IPCTS.

Peter Hayes then went into sharing VTCSecure's findings on the effectiveness of ASR for IPCTS. These finding included scenarios in which ASR worked well and others that were not ideal.

Peter Hayes then went on to discuss VTCSecure's recent partnership with an industry leading ASR provider and how that partner could ensure secure and protected communications.

Peter Hayes then presented on the current and future capabilities of its IPCTS platform including:

- Assigning numbers and making calls to and from the PSTN, voicemail and 911

- A free app that users can download for iOS, Android, PC and Mac. Noting it can also run on inexpensive equipment like the Kindle Fire.
- The ability to do much faster captions that are under 2 seconds as opposed to the current average which far exceeds that.
- The ability to do IPCTS while on a video call and providing a free app hearing users can download which associates with their telephone number.
- The ability for remote users to type real time text to the hard of hearing user in the event ASR fails to provide the correct spelling of a word, place or proper name.
- The ability to do IPCTS in multiple languages.
- The ability to send a text message to a remote party so they can view their own ASR via a webpage to increase accuracy.
- The ability for a deaf or hard of hearing user to use the system instead of making a VRS call in situations where video is unavailable.
- The ability to do IPCTS using T.140 Real Time Text so the technology can be integrated into carrier networks in the future.

Peter Hayes then demonstrated its current hybrid IPCTS system as well as potential future capabilities. The demo started with an IPCTS user making a standard telephone call to a hearing person. An agent is bridged onto the interaction but initially only listens to the hearing user and only views the ASR of the hearing user being automatically generated which is sent via Real Time Text to the IPCTS user. If the ASR captioning is providing a high level of accuracy, then the agent can drop off the call and allow the ASR to continue between the hearing user and the IPCTS user. If the ASR is not working well, has low accuracy or has a low confidence level, the agent can then push a button which allows them to take over the captioning and re-voice or type what the hearing user is saying to ensure the accuracy of the call. Peter Hayes also discussed the capability of automatically having a call be re-queued if the confidence level dropped below a certain threshold as well as allowing the user to push a button on their app bringing an agent back on the call to re-voice.

Finally, Peter Hayes discussed VTCSecure's application for an IPCTS certification stating the many different capabilities it can provide which no other IPCTS providers offer today. Peter Hayes also made the point that VTCSecure can provide a service with significantly faster captioning, without sacrificing accuracy, all while being able to provide an IPCTS service at a much cheaper rate by using its ASR hybrid platform.

Respectfully submitted,

Peter Hayes  
 CEO  
 VTCSecure, LLC  
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